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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

11 Dustin Neff, an individual,
12 Plaintiff,
13 v.
14 SBA Entertainment, LLC; et al.,
15 Defendants.

Case No.: 3:23-cv-02518-JD
Hon. Judge James Donato Presiding

**JOINT STIPULATION TO APPEAR
REMOTELY FOR INITIAL CASE
MANAGEMENT CONFERENCE;
DECLARATION OF FRANK R.
TRECHSEL, ESQ.**

**[*(Proposed) Order Filed Concurrently
Herewith*]**

16
17 Hearing Date: October 19, 2023
18 Time: 10:00 a.m.
19 Courtroom: 11
20 Location: 450 Golden Gate Ave.
21 19th Floor
22 San Francisco, CA 94102
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1 TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTE THAT, pursuant to Local Rule 7-1, Plaintiff Dustin
3 Neff (“Neff”) and Defendants SBA Entertainment, LLC, and Goode Enterprise
4 Solutions, Inc. (“Defendants”) hereby stipulate, by and through their respective
5 counsel of record, that good cause exists to allow for remote appearance by counsel.

6 Good cause exists to allow for remote appearance by counsel for both parties.
7 Neff’s lead counsel has an additional Motion to Dismiss hearing the following day on
8 October 20, 2023 in Los Angeles and resides in Los Angeles. A remote appearance
9 will save both Neff and his counsel money and time by avoiding the travel expense
10 and quick turnaround between hearings. Further, counsel for Defendants resides out
11 of state and will also have to travel to appear. A remote appearance will save her and
12 her client’s significant time and money as well. These cost savings may also assist
13 with settlement discussions.

14 Defendants’ counsel stipulates, agrees, and joins with Neff’s counsel’s request
15 for the remote appearance.

16 The Parties have filed their Joint Case Management Statement and have been
17 working in good faith with each other to resolve this dispute.

18 Granting this stipulation need not impact any other aspect of the Court’s
19 calendar. The parties respectfully request that the Court allow the Parties to appear
20 remotely.

21 SO STIPULATED.

22 Respectfully submitted,

23 Dated: October 17, 2023

24 By: /s/ Frank R. Trechsel
Frank R. Trechsel, Esq.
25 Scott Alan Burroughs, Esq.
DONIGER / BURROUGHS
26 *Attorneys for Plaintiff*

27 Dated: October 17, 2023

28 By: /s/ Valerie Yanaros
Valerie Yanaros, Esq.

1 Yanaros Law, P.C.
2 Attorney for Defendant Goode
3 Enterprise Solutions, Inc.

4 Pursuant to Civil L.R. 54-4.3.4(a)(2)(i), the filer attests that all other
5 signatories listed, and on whose behalf this filing is submitted, concur in the filing's
6 content and have authorized the filing.

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8 Dated: October 17, 2023

By: */s/ Frank R. Trechsel*
9 Frank R. Trechsel, Esq.

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DECLARATION OF FRANK R. TRECHSEL, ESQ.

I, Frank R. Trecshel, Esq., am an attorney at DONIGER / BURROUGHS, which represents Plaintiff Dustin Neff in this action. I have personal knowledge of each of the following facts stated in this declaration:

1. The parties have met and conferred with respect to the filing of the Parties' joint 26(f) report which has been filed.

2. I have a Motion to Dismiss hearing in another matter on Friday, October 20, 2023, in the Central District and reside in Los Angeles. Therefore, in-person appearance at the Initial Case Management Conference in the Northern District would represent unnecessary burden and expense to travel and personally appear at the San Francisco Courthouse, given that telephonic or remote appearances are an available option.

3. A remote appearance will save both myself and our client time and money and should not prejudice the court or any other party.

I declare under penalty of perjury under the law of the State of California and the United States of America that the foregoing is true and correct. Executed on October 17, 2023 in Venice, California.

By: /s/ Frank R. Trechsel
Frank R. Trechsel, Esq.
Declarant